

### **Remarks/Arguments**

Claims 1, 8, 9, 12, 16, 20, 21, 30, 36, 37, 49 and 60 have been amended. Claims 61 and 62 have been added and claims 7, 10, 11, 41 and 55 have been canceled. Please charge any claim or other fees for entry of this Amendment to our Deposit Account No. 03-3415.

The Examiner has rejected applicants' claims 1 and 6-8 under 35 USC § 102(b) as anticipated by the Carr (U. S. Pre-Grant Publication No. 2001/0040349) publication. Claims 3, 9-18, 20 and 22-36 have been rejected under 35 USC § 103(a) based on the latter publication taken with the Namikawa, et al. (US 6,070,911) patent. The Examiner has further rejected applicants' claims 19, 21, 37, 40-51, 52, 53, 54, 55-56, 57 and 58-60 under 35 USC § 103(a) based on the latter two references taken with one or more of the Schlicht (US 5,967,566) patent, the Pabla, et al. (US 2004/0137259) patent application publication, the Energy Partners reference and the Guthrie, et al. (US 4,786,086) patent. With respect to applicants' claims, as amended, these rejections are respectfully traversed.

Applicants' independent claims 1 and 37 have been amended to better define applicants' invention. More particularly, amended claim 1 recites a "connection assembly for connecting first and second components so as to promote electrical isolation therebetween comprising first and second members adapted to be connected to said first and second components and a dielectric member situated between said first and second members, wherein each of said first and second members includes a through opening and said dielectric member is a disk-shaped member having opposing first and second flat surfaces which extend to a through opening in said disk-shaped member, said through openings of said first and second members and said dielectric member being such as to allow passage through the through opening of one of the first and second members, through

the through opening of the dielectric member, and then through the through opening of the other of the first and second members, and wherein the through opening of said dielectric member is smaller than the through openings of said first and second members.”

Additionally amended claim 1 has been amended to further recite “wherein:  
each of said first and second members has first and second opposing surfaces, an outer surface  
connecting the outer peripheries of said first and second opposing surfaces, and the through  
opening of each of said first and second members extends between the first and second  
surfaces of that member; said through opening of said dielectric member extends between the  
first and second surfaces of the dielectric member; and the first surface of said dielectric  
member faces the first surface of one of said first and second members and the second surface  
of said dielectric member faces the first surface of the other of said first and second members;  
the first surface of said dielectric member outward of the through opening of the dielectric  
member abuts a part of the first surface of said one of said first and second members and the  
second surface of the dielectric member outward of the through opening of the dielectric  
member abuts a part of the first surface of the other of said first and second members; said  
parts of said first surfaces of said first and second members are coated with a dielectric  
coating; said coating on said parts of said first surfaces of said first and second members is  
polished; and the through opening of each of said first and second members is coated with a  
dielectric material starting at a location adjacent said first surface of that member and ending  
at a second location which is a preselected distance from said first location and short of said  
second surface of that member.”

Independent claim 37 has been similarly amended. Such a construction is not taught or suggested by the cited art of record. In particular, amended claim 1 now includes

certain of the features of amended claim 9 and the features of canceled claims 10 and 11. The Examiner has argued that these features would be usable in the Carr reference based on the teachings of the Namikawa, et al. patent. Specifically, the Examiner argues that “Namikawa teaches that any and all of the parts used in the assembly may be coated with a dielectric material that is of mica material and/or ceramic coating” and that “[a]t the time of the invention it would have been obvious to a person of ordinary skill in the art to include the features of the Namikawa reference in the Carr reference . . .”

Applicants disagree. It is evident from a careful reading of the Namikawa, et al. patent that the patent does not disclose that “any and all of the parts used in the assembly may be coated with a dielectric material.” (Emphasis added). In particular, the Namikawa, et al. patent discloses that only selected parts of the assembly are coated with such a material.

Specifically, the Namikawa, et al. patent describes an insulation 1 between the seal ring and the hubs which is fabricated using a “coating method adapted to form a layer of an insulating resin on the seal ring.” The insulating layer is applied to the seal ring surfaces contacting the front or first surfaces of the hubs as is described at length at column 2, line 57 through column 3, line 21 of the patent. The Namikawa, et al. patent also describes applying an insulation between the hubs and a clamp which engages the back or second surfaces of the hubs by “applying a coat of insulating resin material (similar to the insulation 1) to the clamp and the hubs or by interposing lamination of metal and resin material shown in FIG. 4 between the clamp and the hubs.” (Column 3, lines 35-48).

The Namikawa, et al. patent, therefore, does not teach or suggest using an insulating material on the first surfaces of the hubs which contact the seal ring, let alone that this

material is polished. Nor is there any teaching or suggestion in the patent of using an insulating material on the surfaces of the through openings of the hubs starting from adjacent the first surfaces of the hubs contacting the sealing rings. Rather, the Namikawa, et al. patent discloses the use of an insulating material only on the surfaces of the seal ring and on the second hub surfaces contacting the clamp. No other surfaces of the assembly are taught or suggested to have such a material.

Thus, applicants amended claims 1 and 37, and their respective dependent claims, in reciting “said parts of said first surfaces of said first and second members are coated with a dielectric coating; said coating on said parts of said first surfaces of said first and second members is polished; and the through opening of each of said first and second members is coated with a dielectric material starting at a location adjacent said first surface of that member and ending at a second location which is a preselected distance from said first location and short of said second surface of that member” patentably distinguish over the combination of the Carr and Namikawa, et al. references.

Moreover, the other cited references, i.e., the Schlicht patent, the Pabla, et al. patent application publication, the Energy Partners reference and the Guthrie, et al. patent were cited for features unrelated to those discussed above as patentably distinguishing applicants’ amended claims over the Carr and Namikawa, et al. references. Applicants’ amended claims thus patentably distinguish over all these references.

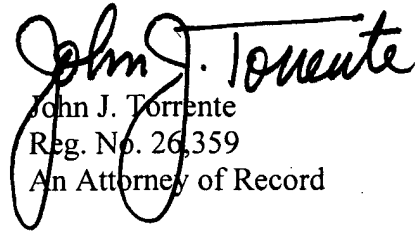
In view of the above, it is submitted that applicants’ claims, as amended, patentably distinguish over the cited art of record. Accordingly, reconsideration of the claims is

respectfully requested.

Dated: May 31, 2006

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Respectfully submitted,

  
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